

EXHIBIT "C"

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LARRY C. FLYNT, LFP VIDEO :
GROUP, LLC, AND LFP IP, :
LLC, :
:
Plaintiffs, :
vs : Case No.
: 2:09-cv-00048-AHM (RZx)
FLYNT MEDIA CORPORATION, :
a Delaware Corporation; :
JIMMY FLYNT, II; DUSTIN :
FLYNT; and DOES 1 through :
10 inclusive, :
:
Defendants. :

Deposition of: JIMMY FLYNT

Taken: By the Plaintiffs
Pursuant to Notice

Date: Wednesday, October 21, 2009

Time: 10:20 a.m.

Place: Reminger Co. LPA
525 Vine Street
Suite 1700
Cincinnati, Ohio 45202

Before: Lisa L. Weisenberger, RPR
Notary Public - State of Ohio

Pages: 1 - 77.

COPY

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APPEARANCES:

On behalf of the Plaintiffs:

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and

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On behalf of the Defendants:

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On behalf of the Witness:

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and

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JIMMY FLYNT,

being by me first duly cautioned and sworn, deposes
and says as follows:

DIRECT EXAMINATION

BY MR. BROWN:

Q. Good morning, Mr. Flynt. As you
probably know, I represent the plaintiffs in a case
that is pending in the Central District of
California. Can you kindly state and spell your
name for the record.

A. Well, first of all, I thought that
you and your firm, Paul Cambria, represented me. Am
I mistaken about that?

Q. I have never represented you, so --

A. Well, I am a witness. Paul Cambria
has represented me for over 30 years in the '70s, in
the '90s, and the 2000s, both on a personal and
professional basis, criminally, civilly. So you are
a representative of Paul's. That leads me to
believe that you represent me.

Q. Well, Mr. Flynt, your attorneys had
every opportunity to file some type of motion. And
we are now here for the second time in Cincinnati
trying to take your deposition, and I find it very
puzzling that we are now here, again, and now there

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is a new issue that has arisen. So, you know, if
your attorneys want to move for a protective order,
so be it.

MR. HOJNOSKI: The witness is asking
a lawyer what his relationship is with the
witness.

MR. BROWN: I'm not here to answer
questions, Bob. I am here to ask
questions. And I think you know that.

MR. HOJNOSKI: So you refuse to
answer that question?

MR. BROWN: Bob, I am not here to
answer questions. This is a deposition of
your client. And if this was an issue
that was so burning and important --

MR. HOJNOSKI: It's been raised with
Mr. Covatta for months.

MR. BROWN: Well, you have an
opportunity to do something about it. It
is called seeking a protective order. And
if you believe you have a basis -- if your
client believes there is a rational,
logical basis for some type of motion,
then go ahead and bring it.

MR. HOJNOSKI: Uh-huh. He is not

2 (Pages 2 to 5)

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1 refusing to answer your questions. He
2 asked you a question. If you are not
3 going to answer it, you're not going to
4 answer it, and we'll move on.

5 MR. BROWN: Okay. Let's move on.

6 BY MR. BROWN:

7 Q. Can you kindly state and spell your
8 name for the record, please.

9 A. Jimmy, with a Y, F-l-y-n-t.

10 Q. Okay. Mr. Flynt, as you know, you
11 have been placed under oath. You understand
12 anything you say here today is subject to penalties
13 of perjury. Do you understand that?

14 A. Yes.

15 Q. Okay. And when I ask you questions
16 today, if you don't understand the question, you
17 need to let me know that; is that fair?

18 A. Yes.

19 Q. Okay. And as you know -- I am sure
20 you know, but I will repeat it anyway. Today we
21 have a court reporter that is with us. She is
22 sitting to your left, and she will be taking down
23 everything that is said today. Do you understand
24 that?

25 A. Yes.

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1 Q. Okay. And she is going to be
2 preparing a transcript for your review. Do you
3 understand that?

4 A. Yes.

5 Q. Okay. And you will have an
6 opportunity to review the transcript and make any
7 corrections that you deem necessary.

8 A. Yes.

9 Q. Okay. And you also understand that
10 if you make a correction or a change to the
11 transcript that counsel for either party may comment
12 to the jury or to the judge about the corrections at
13 the time of trial?

14 A. Yes.

15 Q. Okay. And, Mr. Flynt, are you the
16 brother of Larry Claxton Flynt?

17 A. Yes.

18 Q. Are you the father of Jimmy R. Flynt,
19 II?

20 A. Yes.

21 Q. Are you the father of Dustin Flynt?

22 A. Yes.

23 Q. When did you first hear of the
24 formation of a company known as Flynt Media
25 Corporation?

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1 A. Late summer, fall of 2008.

2 Q. And how did you -- how did you come
3 to know about that?

4 A. Best I remember, Larry informed me
5 that Dustin was at a convention representing a Flynt
6 company.

7 Q. And would you know the name of that
8 convention?

9 A. No.

10 Q. Okay. And it was Larry that informed
11 you of that?

12 A. Yes.

13 Q. Okay. And did -- after learning of
14 that information, did you seek out Dustin?

15 A. No. Everything -- nothing -- just
16 nothing was mentioned of that until -- until a few
17 months later. January of '08 Larry called me and
18 informed me that they were at a convention in
19 Las Vegas using the Flynt name.

20 Q. Okay. Is that the second time
21 that --

22 A. Yes.

23 Q. -- it was brought to your attention?

24 A. Right.

25 Q. Did your -- prior to January -- and

Page 9

1 was it '08 or '09; do you recall?

2 A. In '08 prior to the '08 convention.

3 Q. Okay. And prior to that date in
4 January of '08 when you had this conversation with
5 Larry, prior to that did you have any conversations
6 with your sons regarding Flynt Media Corporation?

7 A. Very casually because probably --
8 when they were terminated at the end of '07, our
9 relationship was a little estranged. So we didn't
10 communicate because I think they felt that I should
11 have did more to prevent their termination.

12 So after a while they understood that
13 I had no control of their termination. So later
14 that year we did talk. But they did not discuss
15 with me their projects, what they were working on,
16 and they left me out of the circle of business. I
17 heard it from no other people in the industry, had
18 no contact with those people in the industry,
19 because there was very difficult times at that time
20 that my brother and I were going through, you know,
21 on a personal basis and no communication with my
22 boys with regard to that. But things did start
23 heating up in January when they did the launch
24 party, as Larry put it, in Las Vegas.

25 Q. Okay. So just so I am clear, prior

3 (Pages 6 to 9)

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1 to the Las Vegas launch party, you didn't have any
 2 role in the formation of the company in any way?
 3 **A. No, I did not.**
 4 **Q. Okay. Did you give your sons any --**
 5 **prior to the January launch date, did you give any**
 6 **advice to your sons about forming this company?**
 7 **A. No.**
 8 **Q. When did you first have**
 9 **conversations -- well, let me back up. Did you ever**
 10 **have a conversation with your sons about the**
 11 **formation of Flynt Media Corporation?**
 12 **A. After Larry talked to me in January.**
 13 **Q. Okay. And who did you talk with?**
 14 **A. I believe I spoke to both of them**
 15 **that day that Larry called me. It was the 8th or**
 16 **9th of January. And, basically, Larry told me to**
 17 **have the boys drop the name, Flynt, and leave the**
 18 **convention. That was the first call.**
 19 **And then a second day went by and**
 20 **they were still promoting the company in Vegas and**
 21 **at that time he informed me -- Larry informed me**
 22 **that if I didn't have them drop that name that he**
 23 **was going to cut my pay off, stop my pay, and I -- I**
 24 **suppose that they had -- they had started a lawsuit**
 25 **or cease and desist. I don't exactly know. But he**

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1 **informed me that he was going to stop my pay to fund**
 2 **his lawsuit against my boys.**
 3 **Q. Okay. Now, backing up, I want to**
 4 **know about your first conversations with your sons**
 5 **regarding -- after you spoke with Larry in January.**
 6 **Did you have conversations with your sons?**
 7 **A. Yes. I told them what Larry's wishes**
 8 **were, what his -- what he had requested and then**
 9 **what he had demanded.**
 10 **Q. And did you ever discuss with the**
 11 **boys maybe changing the name?**
 12 **A. No.**
 13 **Q. Did you ever ask them why they**
 14 **weren't using their first names?**
 15 **A. No.**
 16 **Q. Do you know anything about how the**
 17 **company, Flynt Media Corporation, how it was**
 18 **capitalized?**
 19 **A. No.**
 20 **Q. You didn't have any investment in the**
 21 **company; is that correct?**
 22 **A. No.**
 23 **Q. Did you loan Jimmy -- your son,**
 24 **Jimmy -- any money prior to the formation of Flynt**
 25 **Media Corporation?**

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1 **A. No.**
 2 **Q. Did you lend any money to Dustin**
 3 **Flynt prior to the formation of Flynt Media**
 4 **Corporation?**
 5 **A. No.**
 6 **Q. Did you ever have any involvement**
 7 **with Flynt Media Corporation --**
 8 **A. No.**
 9 **Q. -- whatsoever?**
 10 **Did you ever discuss the issue of**
 11 **insurance with your sons?**
 12 **A. No.**
 13 **Q. To your knowledge, who owns Flynt**
 14 **Media Corporation?**
 15 **A. I don't know.**
 16 **Q. Are you familiar with an entity known**
 17 **as Empire Wells?**
 18 **A. No.**
 19 **Q. Do you have any shares of Flynt Media**
 20 **Corporation?**
 21 **A. No.**
 22 **Q. Have you lent money to Flynt Media**
 23 **Corporation?**
 24 **A. No.**
 25 **Q. Have you been promised any kind of**

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1 compensation from Flynt Media Corporation?
 2 **A. No.**
 3 **Q. Do you have any information**
 4 **concerning the decision to name the company Flynt**
 5 **Media Corporation?**
 6 **A. No.**
 7 **Q. Do you have any information**
 8 **concerning the naming of a DVD line with the name**
 9 **Flynt?**
 10 **A. No.**
 11 **Q. Were you ever consulted by your sons**
 12 **concerning an adult DVD line named Flynt?**
 13 **A. No.**
 14 **Q. Earlier you testified about a**
 15 **conversation you had with your sons concerning**
 16 **Larry's wishes and demands. After you conveyed**
 17 **those, have you had -- did you have any additional**
 18 **conversations with your sons concerning changing the**
 19 **name?**
 20 **A. Sure. I continued -- after the**
 21 **January date of the demand to change from Larry, I**
 22 **continued to talk to Larry. He continued to advise**
 23 **me of the money that he was spending with his**
 24 **lawyers and that he had to recoup that money and**
 25 **that money was going to come from my compensation.**

4 (Pages 10 to 13)

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1 I kept sharing that with my brothers – or with my
2 boys and I told them my future was at stake, my job.
3 And I shared with them on a continuous basis for
4 about a month of what Larry's wishes and demands
5 were.

6 We got on into February and things
7 heated up then to the point of where it was time, I
8 guess, to stop my pay. He was in – Larry was on a
9 trip to Europe. I suppose he called human resource,
10 and Paul Cambria sent an e-mail to Lou Sirkin
11 indicating that Larry was going to stop my pay if I
12 didn't control my boys.

13 So about the middle – we get paid
14 every two weeks. So my money was put in my account
15 for the first pay period of February. A day or a
16 few hours later that money was backed out of my
17 account, backed out of Chase out of my account, by,
18 I suppose, human resource. So that, basically, my
19 pay stopped in February, as he indicated.

20 Then shortly thereafter, for some
21 reason, he sent me a check for \$10,000, indicated
22 maybe to help me with my bills. Never did quite
23 understand that.

24 But in the meantime, my benefits were
25 left intact. My insurance was left intact. And he

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1 I had indicated that I was losing my pay on a
2 regular basis. My boys have not changed the name
3 evidently. They did not follow my request. What
4 was I to do? I had no control.

5 Q. Do you recall at any point in time
6 having a conversation with your sons about the
7 possibility of your brother suing them if they set
8 up an adult DVD company?

9 A. No. That was an ongoing thing that
10 after – in January, I guess, the suit had been
11 filed.

12 Q. Okay. Well, prior to the suit being
13 filed, I just –

14 A. No.

15 Q. – wanted to know –

16 A. No. No. No. I didn't get involved
17 until Larry engaged me to get involved in January.

18 Q. Did you have any conversations with
19 anyone else concerning Flynt Media Corporation other
20 than your attorneys, Larry, and your sons?

21 A. No.

22 Q. Did you ever talk to anybody else in
23 the industry concerning –

24 A. No.

25 Q. – Flynt Media Corporation?

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1 indicated, I guess, in depositions that I was – I
2 wasn't being paid because the money was going to
3 lawyers to fund the suit, but my benefits were
4 intact.

5 So that's basically what happened.
6 You know, and today I don't know my employment
7 status. Maybe you could tell me. As my lawyer, you
8 could tell me my status. I have tried to get
9 information from Cambria's office, Diane Roberts. I
10 have requested my status, my human resource records.
11 I can't seem to get any indication, any proof that I
12 am – I am discharged or if I am an employee, if I
13 am being paid. I don't know my status. Maybe you
14 could tell me, Mr. Brown.

15 Q. Mr. Flynt, again, I'm not here to
16 answer questions.

17 Going back to my question, though, I
18 wanted to know about any conversations you had with
19 your boys post the conversations you have already
20 told me about post January/February of '08.

21 A. I talked to my boys on a regular
22 basis and – because I talked to my brother on a
23 regular basis. And he insisted that I convey to my
24 boys to drop the suit, to drop the name. I kept
25 telling him that I had passed that word on to them,

Page 17

1 A. No.

2 Q. Talk to anybody at AVN –

3 A. No.

4 Q. – concerning the lawsuit?

5 A. No.

6 Q. Talk to Mike Warner concerning the
7 lawsuit?

8 A. No.

9 Q. Talk to Theresa Flynt concerning the
10 lawsuit?

11 A. No.

12 Q. Talk to Michael Klein about the
13 lawsuit?

14 A. No.

15 Q. You currently don't have any type of
16 position with Flynt Media Corporation, do you?

17 A. No.

18 Q. What about Empire Wells?

19 A. No.

20 Q. How about any company associated with
21 your sons?

22 A. No.

23 Q. Are you aware of any business
24 plans -- written business plans -- that your sons
25 may have been involved with?

5 (Pages 14 to 17)

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1 A. No.
2 Q. Are you aware of any contracts or
3 agreements that Flynt Media Corporation may have
4 been involved with?
5 A. No.
6 Q. Are you aware of any contracts or
7 agreements that your sons may be parties to
8 involving adult motion pictures?
9 A. No.
10 Q. Are you aware of the type of products
11 that Flynt Media Corporation was planning on
12 releasing?
13 A. I never saw the product.
14 Q. Okay. Are you aware of what type of
15 product it was?
16 A. I imagine it was adult product. I
17 don't know.
18 MR. DeCARLO: Calls for speculation.
19 A. I never seen a movie.
20 (Trial Exhibit 2 was
21 referenced.)
22 MR. BROWN: Okay. I am going to --
23 this is Trial Exhibit No. 2, Dan.
24 MR. DeCARLO: Okay.
25 MR. BROWN: Here you go.

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1 MR. SIRKIN: I'm not over 18. You
2 can't disseminate it to me.
3 MR. BROWN: Mr. Sirkin says he's
4 under the age of 18, so I am in trouble,
5 Dan, for putting Exhibit 2 in front of
6 him.
7 MR. COVATTA: Mentally he is under
8 the age of 18.
9 BY MR. BROWN:
10 Q. Okay. Mr. Flynt, I just handed you a
11 document. It's our Trial Exhibit No. 2. Have you
12 ever seen this document?
13 A. No.
14 Q. Do you have any idea of what this
15 document is?
16 A. It looks like a sleeve cover for a
17 DVD/VHS.
18 Q. Are you aware of any products
19 whatsoever that your sons intended to distribute
20 bearing the name Flynt?
21 A. No.
22 Q. Are you aware of any websites that
23 your sons had set up to distribute adult products?
24 MR. DeCARLO: Objection as to time.
25 Q. Well, prior to the lawsuit?

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1 A. No.
2 Q. Okay. Post lawsuit?
3 A. Recently I saw a site called Flynt
4 Nation.
5 Q. Okay. FlyntNation.com?
6 A. Yes.
7 Q. Okay. And are you aware of any other
8 websites that your sons may have set up?
9 A. No.
10 (Trial Exhibit 3 was
11 referenced.)
12 MR. BROWN: Okay. Dan, I am just
13 going to turn real quick to Trial Exhibit
14 No. 3.
15 BY MR. BROWN:
16 Q. And, Mr. Flynt, I just put in front
17 of you a hard copy printout from the website
18 flyntdistribution.com. Do you see the document?
19 A. Yes.
20 Q. Okay. Have you ever seen this
21 document before?
22 A. No.
23 Q. Do you recall ever seeing a website
24 by the name of flyntdistribution.com?
25 A. No.

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1 Q. Do you recall ever seeing the name
2 Flynt Corp. on anything involving your sons?
3 A. Date?
4 Q. Prior to the lawsuit being commenced.
5 A. No.
6 Q. After the lawsuit?
7 A. Yes.
8 Q. Okay. What did you see?
9 A. I saw a business card recently and,
10 like I said, the FlyntNation.com recently.
11 Q. Okay. And prior to your deposition
12 today, did you review any documents?
13 A. No.
14 Q. And prior to your deposition today,
15 did you speak with your sons?
16 A. No.
17 Q. Prior to your deposition today, did
18 you speak with anybody about the deposition?
19 A. My attorneys that there was an up and
20 coming deposition.
21 Q. Okay. And I'm not interested in what
22 might have been discussed between you and your
23 attorneys, but I am interested in the -- in whether
24 or not you have had conversations with anyone else.
25 A. No.

6 (Pages 18 to 21)

Page 22

1 Q. Did you ever speak with Mr. DeCarlo?
 2 A. No.
 3 Q. You understand Mr. DeCarlo, who is on
 4 the phone with us now, represents your sons in the
 5 litigation that is pending?
 6 A. **That is what I heard this morning,**
 7 **yes.**
 8 Q. Okay. Have you had conversations
 9 with anyone from Mr. DeCarlo's law firm?
 10 A. No.
 11 Q. Are you familiar with a law firm in
 12 Las Vegas that represents your sons?
 13 A. No.
 14 Q. Do you have any attorneys in
 15 Las Vegas?
 16 A. No.
 17 Q. Are you aware that your son, Dustin
 18 Flynt, recently filed an application in front of the
 19 United States Patent and Trademark office for the
 20 trademark "Dustin Flynt"?
 21 A. No.
 22 Q. Did you discuss in any way with
 23 Dustin Flynt his trademark application?
 24 A. No.
 25 Q. Have you at any time -- at any time

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1 had any conversations with your sons related to
 2 business advice?
 3 A. No.
 4 Q. Do you have any knowledge concerning
 5 the production of DVDs -- of your sons' production
 6 of DVDs?
 7 A. No.
 8 Q. Do you have any knowledge of your
 9 sons' plans to distribute adult DVDs?
 10 A. No.
 11 Q. Do you have any knowledge of your
 12 sons' plans to distribute adult videos via the
 13 Internet?
 14 A. No.
 15 Q. How about any other form of
 16 electronic distribution?
 17 A. No.
 18 Q. Do you know a gentleman by the name
 19 of James Bases?
 20 A. Yes.
 21 Q. Have you had any conversations with
 22 him concerning your sons' enterprise?
 23 A. No.
 24 MR. BROWN: Okay. Dan, I am going to
 25 go to Trial Exhibit 6 and 7.

Page 24

1 (Trial Exhibits 6 and
 2 7 were referenced.)
 3 MR. DeCARLO: Okay.
 4 MR. BROWN: They are -- I don't know
 5 why they were separated originally. I
 6 would have put them together, but --
 7 MR. DeCARLO: I have them.
 8 MR. BROWN: Okay.
 9 BY MR. BROWN:
 10 Q. Here you go. All right. Mr. Flynt,
 11 I am handing to you Exhibits -- Trial Exhibits 6 and
 12 7. Have you ever seen either the first or the
 13 second page I have shown you? Have you ever seen
 14 that before at any time?
 15 A. **Is -- oh, this was a -- I guess a**
 16 **party they had in Las Vegas. I don't remember**
 17 **seeing this, but it looks -- I don't remember -- I**
 18 **don't recall seeing these images.**
 19 Q. Did you attend the launch party in
 20 Las Vegas?
 21 A. No.
 22 Q. Were you in Las Vegas at the time?
 23 A. Yes.
 24 Q. What were you doing the night of the
 25 event?

Page 25

1 A. **Well, I wasn't at the event.**
 2 Q. Did you -- did you speak with your
 3 sons at all at the event?
 4 A. **I spoke to them on a regular basis.**
 5 **Not at the event.**
 6 Q. I'm sorry. I meant -- well, you were
 7 there for a purpose, right?
 8 A. **I have a residence in Las Vegas.**
 9 Q. Okay. Did you attend the -- what is
 10 it? -- the AVN convention?
 11 A. No.
 12 Q. Okay. So you weren't -- you
 13 didn't -- you weren't attending any of the events
 14 related to the AVN expo?
 15 A. No.
 16 Q. Or award show?
 17 A. No.
 18 Q. Do you know anything about the
 19 decision to use the term "You know the name, you
 20 know the game"?
 21 A. No.
 22 Q. Did you ever speak with your sons
 23 about the phrase "You know the name, you know the
 24 game"?
 25 A. No.

7 (Pages 22 to 25)

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1 Q. Did you ever discuss in any way with
2 your sons the event that was held at Club Prive in
3 Las Vegas?

4 A. No.

5 Q. Were you aware that your sons were
6 sent a cease and desist letter at some-time prior to
7 this event?

8 A. No. Larry informed me of that.

9 Q. Okay. Did you have any conversations
10 with your son about --

11 A. No.

12 Q. -- sons about a cease and desist
13 letter at any time?

14 A. No. I only discussed that with
15 Larry.

16 Q. And what was said?

17 A. Basically, what he was doing legally
18 and his plans to sue and cease and desist, whatever
19 happens in a lawsuit. He was planning -- he was
20 planning legal action and somebody was going to have
21 to pay for it, and it wasn't going to be him.

22 Q. Prior to the launch party are you
23 aware of any conversations that might have
24 occurred -- or have any knowledge of conversations
25 that might have occurred between Dustin, your son,

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1 was infamous and I was famous.

2 Q. Well, that is a good way to look at
3 it. Would you say your brother is more famous than
4 you?

5 A. I would say he is more infamous.

6 Q. When was the last time you appeared
7 on CNN being interviewed?

8 A. Over the years I have been -- there
9 is a lot -- there is a lot of interviews with me.
10 But most recently, I haven't been on CNN, that I can
11 recall.

12 Q. Okay. But your brother has?

13 A. Not recently, that I can recall.

14 Q. So if I was to rank who was the most
15 famous -- or infamous, if you will -- would you say
16 that your brother is more in the public eye than
17 you?

18 A. I would say he is more infamous than
19 I am.

20 Q. Right. But I am asking, as far as
21 ranking, where you might fall in the public eye and
22 the public perception. Do you think you have -- you
23 are more well-known than he is nationally?

24 A. I would say that I am famous and my
25 brother is infamous. On what level nationally, I

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1 and Larry, your brother, concerning Flynt Media
2 Corporation?

3 A. No.

4 Q. Concerning adult DVDs?

5 A. No.

6 Q. So from the time you were alerted or
7 became aware -- from Larry -- about Dustin at this
8 event sometime in the fall and until he had this
9 conversation with you about the cease and desist
10 letter, did this topic come up at all?

11 A. No.

12 Q. With anyone?

13 A. No.

14 Q. Were you ever party to any
15 conversations between Dustin and Larry post Dustin's
16 termination with the company?

17 A. No. They were very close. I know
18 they spoke often. Dustin lived with him, lived in
19 his house. I wasn't privy to a lot of their
20 conversations.

21 Q. And, Mr. Flynt, do you consider
22 yourself famous?

23 A. Yes.

24 Q. Okay. And in what way?

25 A. Well, I always looked at it as Larry

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1 don't know.

2 Q. So you don't have, really, any
3 opinion as to whether or not your brother is more or
4 less famous than you?

5 A. I would say that my brother is more
6 infamous than I am.

7 Q. What about well-known? Let's get
8 away from the term "famous" and "infamous." Let's
9 just talk about well-known in the public eye. Would
10 you say your brother is more well-known than you?

11 A. Down through the years I have stood
12 side by side with my brother in various venues in
13 front of different cameras: On a movie set, in a
14 movie, interviews. And like I said, Larry's famous
15 for different things than I am: Being infamous,
16 being outrageous, a rogue-type individual. He is an
17 infamous guy and I am a famous guy. I have stood
18 beside him and been part of him for 40 years. We
19 were always pretty much synonymous together.

20 Q. Would you say the name Larry Flynt is
21 a household name?

22 A. No.

23 Q. Would you say the name Jimmy Flynt is
24 a household name?

25 A. No.

8 (Pages 26 to 29)

Page 30

1 Q. Would you say your brother is
2 well-known in the adult entertainment industry?
3 A. Yes.
4 Q. Would you say he is famous in the
5 adult entertainment industry?
6 A. He is famous for different reasons
7 than I am. Being a spokesman for that industry.
8 Q. Okay. And in what ways are you
9 famous?
10 A. Well, I grew up in the adult
11 industry, just like he did. I never took the podium
12 as many times as he did, but I was always by his
13 side. Both at a podium, in the courtrooms, in front
14 of various judges and prosecutors, I have always
15 been by his side. The adult industry has always
16 looked at us as, quote, the Flynt brothers on trial
17 again. They are together.
18 Q. Did you ever have any conversations
19 with your sons concerning the filing of an
20 injunction?
21 MR. DeCARLO: Objection. Vague.
22 Ambiguous. Calls for a legal conclusion.
23 Q. Well, let's back up. Are you aware
24 that your sons were enjoined from using the name
25 Flynt in isolation on their products?

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1 MR. DeCARLO: Objection. That calls
2 for a legal conclusion and lacks
3 foundation.
4 Mr. Flynt, do you know what
5 "enjoined" means?
6 THE WITNESS: No.
7 MR. BROWN: Dan, I would appreciate
8 it if you didn't try to suggest an answer.
9 BY MR. BROWN:
10 Q. Do you understand that your sons were
11 ordered not to use the name Flynt in isolation on
12 their products?
13 A. I recall a TRO back after -- after
14 the AVN convention. Sometime after that.
15 Q. Do you know what a TRO is?
16 A. Temporary restraining order.
17 Q. Okay. Do you know what a preliminary
18 injunction is?
19 A. Not really. I always got those two
20 confused.
21 Q. Did you understand what the TRO
22 instructed your sons to do?
23 A. Until -- I suppose. I really
24 don't -- legally, I don't understand it. So for me
25 to speculate wouldn't be right.

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1 Q. But do you understand at some point
2 in time a judge ordered your sons not to use the
3 name Flynt in isolation?
4 A. I -- I'm not that familiar with the
5 legal terminology in the period of time that you are
6 talking about.
7 Q. Okay. Let's back up. At some point
8 in time after the Las Vegas convention did you ever
9 become aware -- and I am not using legal terms. Did
10 you ever become aware that a judge ordered your sons
11 to not use the name Flynt in isolation?
12 A. You mean a stand-alone Flynt name?
13 Q. Yes.
14 A. I recall that judge's order.
15 Q. Did you read the order?
16 A. No.
17 Q. Okay. How did you become aware of
18 that?
19 A. Well, it was in the news. It was
20 on -- it was on -- it was in the news. It was
21 nationally on the news.
22 Q. Okay. Did you ever have any
23 conversations with anyone concerning that?
24 A. Let's see. I spoke to Larry about it
25 and then he kept reiterating, "They need to stop so

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1 that I can stop spending money, because they have
2 already lost." I remember having that conversation
3 with Larry.
4 Q. Any other conversations --
5 A. No.
6 Q. -- concerning an order of the court,
7 anything like that?
8 A. No.
9 MR. BROWN: Okay. Let's take a quick
10 recess. Let's go off the record.
11 (Recess taken: 11:00 a.m. to 11:16 a.m.)
12 BY MR. BROWN:
13 Q. Mr. Flynt, during the past two years
14 have you ever given your sons any advice concerning
15 setting up a business in the adult entertainment
16 industry?
17 A. No.
18 Q. How often do you talk with your boys
19 now?
20 A. Every day.
21 Q. Okay. And previously you were
22 testifying -- or you testified -- and correct me if
23 I am wrong, because my memory sometimes can be hazy,
24 I suppose. You testified earlier that prior to the
25 lawsuit you were not communicating a lot with your

9 (Pages 30 to 33)

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1 boys; is that correct?
 2 A. After their termination we were
 3 estranged, because I think they felt that I could
 4 have did more to save them. Because Jimmy and
 5 Dustin was with my brother and myself for 15 and 10
 6 years respectively without any reprimand or any
 7 write-ups or any problems. So they were somewhat
 8 dazed and confused by being terminated. So they
 9 kind of held me responsible. And after a while,
 10 after a few months, they knew I hadn't -- I
 11 couldn't -- couldn't control the situation at that
 12 time.

13 Q. You are unaware of any employment
 14 problems that Dustin had at the company?

15 A. Absolutely not.

16 Q. And the same question for your other
 17 son, Jimmy.

18 A. No.

19 Q. So it was never discussed with you
 20 that there was a concern or a problem concerning
 21 their employment?

22 A. No.

23 Q. Where does Dustin reside now?

24 A. In California.

25 Q. Los Angeles County?

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1 A. Yes.

2 Q. Okay. What about your son, Jimmy?

3 A. In Lexington, Kentucky.

4 Q. And do you have any knowledge as to
 5 where the offices for Flynt Media Corporation
 6 reside?

7 A. No.

8 Q. Or did reside at any point in time?

9 A. No.

10 Q. And, Mr. Flynt, at any point in time
 11 did you -- did you ever see a press release released
 12 by Flynt Media Corporation?

13 A. No.

14 Q. Who is Bill Rix?

15 A. I don't know.

16 Q. You don't know anybody by the name of
 17 Bill Rix that might have worked for your sons?

18 A. Do not know.

19 Q. Do you know anybody who -- other than
 20 your two sons -- that worked in some capacity with
 21 Flynt Media Corporation?

22 A. No.

23 Q. Mr. Flynt, have you always spelled
 24 your name -- your last name F-l-y-n-t?

25 A. Do you want a history on the spelling

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1 of Flynt?

2 Q. No. I just want to know at any point
 3 in time did you spell your name -- your last name --
 4 F-l-i-n-t?

5 A. Yes.

6 Q. Okay. And when did that change?

7 A. In the early '70s. My name got
 8 misspelled when I was in Vietnam. When I returned
 9 from Vietnam in 1969, I continued to spell my name
 10 with an I. And shortly thereafter, myself and my
 11 brother became very well-known in Ohio and we
 12 started spelling our name F-l-y-n-t. I don't
 13 think that there is any dispute that we have the
 14 same mother, same father. My grandfather and
 15 father and Larry's tombstone has F-l-y on it. My
 16 tombstone will have F-l-y on it. So I don't think
 17 that there is any dispute the proper spelling of
 18 Flynt.

19 Q. And why did you change your name back
 20 to the F-l-y-n-t?

21 A. Well, like I said, you know, nearly
 22 40 years ago we became well-known in the state of
 23 Ohio. And, actually, if you look at F-l-i-n-t
 24 versus F-l-y-n-t, it -- you know, Flynt has --
 25 F-l-y-n-t has a smoother font to it, I suppose. So

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1 we chose to both sign our name F-l-y-n-t.

2 Q. And did you ever decide to change
 3 your name back to the F-l-y-n-t because --

4 A. I did --

5 Q. -- because of business difficulties?

6 A. No. No. I did that in the early
 7 '70s in Columbus, Ohio, in front of a judge in
 8 Columbus, Ohio.

9 Q. Do you recall wanting to change your
 10 name because of the embarrassment?

11 A. Wanting to change my name how from
 12 embarrassment?

13 Q. I am just asking you if there was an
 14 embarrassing issue with F-l-i-n-t spelling.

15 A. No. I have always been proud of the
 16 Flynt name and I have always made the Flynt name
 17 proud of me.

18 Q. Did your sons at any point in time
 19 discuss with you why they did not use their first
 20 names on their DVD products?

21 A. No.

22 Q. Did you ever ask them?

23 A. No.

24 MR. BROWN: Okay. Dan?

25

10 (Pages 34 to 37)

| Page 38 | Page 40 |
|---|---|
| <p>1 CROSS-EXAMINATION</p> <p>2 BY MR. DeCARLO:</p> <p>3 Q. Hello, Mr. Flynt. My name is Dan</p> <p>4 DeCarlo, and I represent your sons and Flynt Media</p> <p>5 Corp. and I have a handful of questions for you.</p> <p>6 MR. BROWN: And, Dan, just before you</p> <p>7 start, I want to put this objection on the</p> <p>8 record. I want to note for the record</p> <p>9 that Mr. DeCarlo and his firm, his</p> <p>10 clients, didn't notice the depo, they</p> <p>11 didn't seek relief from the court in Ohio</p> <p>12 related to asking questions. I am going</p> <p>13 to object to anything that I believe is</p> <p>14 beyond the scope of the direct</p> <p>15 examination. And I also object to the</p> <p>16 questioning to the extent that the</p> <p>17 magistrate judge only permitted</p> <p>18 plaintiffs to ask questions. So with that</p> <p>19 standing objection to this line of</p> <p>20 questioning, we, of course, reserve all of</p> <p>21 our rights to seek any kind of motion,</p> <p>22 whether it be a protective order or</p> <p>23 motion in limine. And that objection</p> <p>24 applies to any and all questions that you</p> <p>25 ask, Dan.</p> | <p>1 company called Flynt Management?</p> <p>2 A. Yes.</p> <p>3</p> <p>4</p> <p>5 REDACTED</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 A. Yes.</p> <p>11 Q. Did it cause you a significant amount</p> <p>12 of distress when that --</p> <p>13 MR. BROWN: Objection. Relevance.</p> <p>14 Q. Did it cause you --</p> <p>15 MR. BROWN: Ambiguous.</p> <p>16 Q. Mr. Flynt, did it cause you a</p> <p>17 significant amount of distress when that pay was cut</p> <p>18 off?</p> <p>19 A. Absolutely. Yes.</p> <p>20 MR. DeCARLO: Okay. I would like to</p> <p>21 place in front of the witness Exhibit 21.</p> <p>22 (Trial Exhibit 21 was</p> <p>23 referenced.)</p> <p>24 MR. BROWN: It's a two-page exhibit,</p> <p>25 Dan?</p> |
| Page 39 | Page 41 |
| <p>1 MR. DeCARLO: Mr. Brown, I provided</p> <p>2 you with authority on October 9th from a</p> <p>3 case called Spray Products versus Strouse,</p> <p>4 31 F.R.D. 211 --</p> <p>5 MR. BROWN: Dan --</p> <p>6 MR. DeCARLO: -- quote --</p> <p>7 MR. BROWN: Dan, can we just cut this</p> <p>8 off just for a second? I understand you</p> <p>9 have arguments. And, hopefully, you</p> <p>10 recognize that we have arguments. And I</p> <p>11 would rather not waste our time here right</p> <p>12 now arguing this point. I am merely</p> <p>13 preserving my objection. I understand</p> <p>14 that you have a position, and, hopefully,</p> <p>15 you understand that we have a position.</p> <p>16 MR. DeCARLO: Okay. Then I will just</p> <p>17 move on.</p> <p>18 BY MR. DeCARLO:</p> <p>19 Q. Mr. Flynt, taking you back for a</p> <p>20 moment to the issue of your pay, you indicated that</p> <p>21 in February of 2009, I believe, that your pay from</p> <p>22 Hustler ceased; is that correct?</p> <p>23 A. Actually -- actually, Larry and I</p> <p>24 were jointly together paid from Flynt Management.</p> <p>25 Q. So your check or payment came from a</p> | <p>1 MR. DeCARLO: It's a three-page</p> <p>2 exhibit.</p> <p>3 MR. BROWN: Oh, I'm sorry.</p> <p>4 And just for the record, we are going</p> <p>5 to -- this is a Trial Exhibit 21.</p> <p>6 MR. DeCARLO: Correct.</p> <p>7 And, Ms. Reporter, I would like to</p> <p>8 make sure that all of these -- even though</p> <p>9 these exhibits have been already marked,</p> <p>10 if you could attach these to the</p> <p>11 transcript, that would be helpful.</p> <p>12 THE COURT REPORTER: Okay.</p> <p>13 MR. BROWN: Give me one second, Dan.</p> <p>14 I want to make sure everybody has a copy.</p> <p>15 MR. SIRKIN: We do.</p> <p>16 MR. BROWN: Oh, okay. You guys</p> <p>17 already have a copy?</p> <p>18 MR. HOJNOSKI: I printed them out</p> <p>19 here.</p> <p>20 MR. BROWN: Okay. Thank you,</p> <p>21 gentlemen.</p> <p>22 Okay. They are ahead of me already.</p> <p>23 MR. DeCARLO: Okay.</p> <p>24 BY MR. DeCARLO:</p> <p>25 Q. Mr. Flynt, on the bottom of the</p> |

11 (Pages 38 to 41)

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1 exhibit I have written 21-1 and then 21-2 and 21-3,
2 indicating the specific page. So I will refer to
3 those pages when I ask a question.

4 Specifically, related to 21-1, have
5 you ever seen this e-mail before from Paul Cambria
6 to Lou Sirkin on February 25th, 2009 -- or 26th,
7 2009?

8 A. Yes.

9 Q. Mr. Cambria reports to Mr. Sirkin
10 that Larry had called him from Germany and indicated
11 he was "cutting Jimmy off." Had you ever heard that
12 term before "cutting off"? Is that -- strike that.

13 Is the term "cutting off" a term that
14 Larry, in your experience, uses?

15 MR. BROWN: Objection. Relevance.

16 A. No. That's not what in business
17 practice you use. You know, in a business practice
18 you are going to -- if you are going to, I guess,
19 cut someone's pay off, you would terminate them. We
20 never used that terminology of cut off, no.

21 Q. Okay. If you turn to 21-3. It's an
22 e-mail from Mr. Cambria to Mr. Lou Sirkin. He
23 indicates that if Larry has to spend any time
24 cutting Jimmy's -- I'm sorry. If he has to spend
25 any more money, he is cutting Jimmy off and using

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1 of Larry's companies?

2 A. They worked for -- like I said, Jimmy
3 and Dustin worked for Larry and I respectively for
4 15 and 10 years.

5 Q. Okay. And Mr. Larry Flynt asked you,
6 if I understand correctly, to use whatever influence
7 that you had over your sons to try to get your sons
8 to -- strike that.

9 What specifically did Larry Flynt
10 tell you he wanted you to do with regards to your
11 sons and the lawsuit that Mr. Flynt had filed
12 against them?

13 A. Well, he kept -- he kept using the
14 terminology that "have them drop the suit." Well,
15 you know, they would come back to me and say, "Well,
16 we didn't file the suit. It is up to him to drop
17 the suit." And then he would -- then he would come
18 back and he would say, "Well, have them drop the
19 name." So I would -- I would pass on Larry's
20 request and demands. And -- and that is all I could
21 do.

22 Q. Did Larry ever explain to you why he
23 thought that you had influence over your sons to get
24 them to, quote, "drop the name"?

25 MR. BROWN: Objection. Relevance.

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1 the money to fund the lawsuit.

2 You had discussions with Mr. -- with
3 your brother, Larry Flynt, about this issue,
4 correct?

5 A. Yes, in -- yes.

6 Q. Did Mr. Flynt ever -- did Mr. Larry
7 Flynt ever explain to you why he felt that you could
8 control the actions of your grown sons?

9 MR. BROWN: Objection. Relevance.

10 Ambiguous. Vague. Leading.

11 Q. Let me strike the question and start
12 it -- lay a little foundation, Mr. Flynt. At the
13 time that this event occurred, February of 2009,
14 your sons, Jimmy and Dustin, were how old?
15 Approximately.

16 A. What was the word? They were what?

17 Q. How old.

18 A. Oh, how old.

19 Q. How old were they?

20 A. 32 and 35.

21 Q. And to your knowledge --

22 A. 31.

23 Q. And to your knowledge, sir, did both
24 Dustin and Jimmy their entire adult lives up to that
25 point -- or up to the point of 2007 -- work for one

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1 Ambiguous. Leading.

2 Q. You can answer, sir.

3 A. He assumed that I was the father and
4 that I could -- could control them. But I think he
5 pretty much summed it up in another e-mail where he
6 said, "Jimmy, I can understand why they are doing
7 this to me." Larry. "I don't know why they are
8 doing this to you." So that was -- that, I guess,
9 sums it up in saying why he thought I could control
10 them.

11 MR. DeCARLO: If we could put
12 Exhibit 24 in front of the witness. I
13 believe that is the e-mail you are talking
14 about, Mr. Flynt.

15 (Trial Exhibit 24 was
referenced.)

16 MR. BROWN: Here you go. I've placed
17 24 in front of the witness.

18 BY MR. DeCARLO:

19 Q. Mr. Flynt, would you take a look at
20 that for me, please.

21 A. Yes.

22 Q. You have seen that e-mail before?

23 A. Yes.

24 Q. This is from Courtney Vittti. Do you
25

12 (Pages 42 to 45)

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1 know that to be Mr. Flynt's secretary?
 2 **A. Yes. And that is Larry's e-mail.**
 3 Q. Okay. And do you recall him sending
 4 you two invoices relating to the litigation?
 5 **A. Yes.**
 6 Q. It was your understanding that he
 7 wanted you to pay them?
 8 MR. BROWN: Objection.
 9 **A. Yes.**
 10 MR. BROWN: Relevance. Ambiguous.
 11 **A. Yes. I think they were -- I think**
 12 **they were for, like, around -- around 50,000 or**
 13 **something.**
 14 Q. Do you recall what they specifically
 15 were for?
 16 **A. For a survey or something.**
 17 Q. Mr. Flynt, did your brother, Larry
 18 Flynt, ever explain to you what he meant by the
 19 statement, "I can't -- I cannot understand why they
 20 are doing it to you"?
 21 **A. Well, I think it is very obvious that**
 22 **it had to do with my -- with my money is that --**
 23 **that is what I take from it.**
 24 Q. Did he ever offer any explanation to
 25 you for why he thought it was appropriate or okay to

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1 use your pay as a lever to try to get your sons to
 2 do what he wanted them to do?
 3 MR. BROWN: Objection. The question
 4 is leading, ambiguous, compound. And also
 5 inserting a relevance objection.
 6 Q. Do you understand my question,
 7 Mr. Flynt?
 8 **A. It's -- I think it's very simple,**
 9 **both from -- well, a layman's viewpoint is that --**
 10 **that to control one's income that you can control**
 11 **their actions and force them to do things that they**
 12 **wouldn't otherwise do. So you -- you cut -- you**
 13 **cut -- you cut the food chain loose, you know.**
 14 Q. When Mr. Larry Flynt made these
 15 requests of you with regard to what he wanted you to
 16 do vis-a-vis your sons, did you, in fact, try to
 17 prevail on your sons to do what Larry wanted them to
 18 do?
 19 MR. BROWN: Objection. Relevance.
 20 **A. Many, many times.**
 21 Q. So you were unable or you did not
 22 meet with any success in having your sons agree to
 23 Larry's requests?
 24 **A. Had no success. They did not -- they**
 25 **did not listen to me.**

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1 Q. In February of 2008 you indicated
 2 that your salary had actually been placed -- or your
 3 pay from Flynt Management Group had actually been
 4 placed in your bank account; is that correct?
 5 **A. Yes. I had direct transfer, direct**
 6 **deposit, and they put it in on a -- they put it in**
 7 **on a Friday morning and backed it out on a Friday.**
 8 Q. So the money, to your knowledge, was
 9 actually at one point in your account?
 10 **A. Yes.**
 11 Q. And then it was taken out of your
 12 account?
 13 **A. Yes. And he called -- he evidently**
 14 **called someone from Germany, from Europe, as he had**
 15 **called me and Lou Sirkin, to indicate what his plans**
 16 **were. And he obviously called someone else to have**
 17 **that electronic transfer of money redirected.**
 18 Q. Did anyone ever ask your permission
 19 for whether or not money could be removed from your
 20 bank account?
 21 MR. BROWN: Objection. Relevance.
 22 **A. I tried -- when I -- when I got --**
 23 **when I looked at the bank account, I asked them what**
 24 **happened, and they said they really didn't know. So**
 25 **I just assumed that, you know, that is -- that is**

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1 **what it was. In fact, it went in the account and a**
 2 **few hours later it was backed out of the account and**
 3 **it was gone.**
 4 Q. No one at the bank ever advised
 5 you --
 6 **A. No.**
 7 Q. -- how something like that can even
 8 happen?
 9 **A. No.**
 10 Q. Since February of 2009 when this
 11 event occurred about your money being backed out of
 12 your account, and other than the \$10,000 check that
 13 you said Larry sent you sometime after February of
 14 2009, have you received any other money --
 15 **A. None.**
 16 Q. -- from --
 17 MR. BROWN: Objection.
 18 **A. No.**
 19 MR. BROWN: Relevance.
 20 Q. Okay. And after February of 2009 has
 21 your brother indicated that he intends to reinstate
 22 your pay?
 23 MR. BROWN: Objection. Relevance.
 24 No foundation.
 25 **A. Well, on various occasion -- on**

13 (Pages 46 to 49)

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1 various occasions that if I could settle this
2 trademark case and if my sons both -- he passed the
3 word to them and to me that if we could resolve this
4 trademark case that he would reinstate me.

5 Q. At your -- at your previous pay?

6 A. At my previous pay.

7 Q. Do you know if that offer from your
8 brother is still -- has he reiterated that offer
9 recently?

10 MR. BROWN: Objection. Relevance.

11 A. No.

12 Q. Have you talked to your brother about
13 this lawsuit recently?

14 A. No.

15 Q. Okay. Mr. Flynt, I would like
16 you -- I would like to go back and ask you a few
17 questions about what you were talking about with
18 Mr. Brown earlier about your fame. In the movie
19 The People vs. Larry Flynt, I presume you have seen
20 it?

21 A. Yes.

22 Q. And you are featured somewhat
23 prominently in that movie, correct?

24 A. Yes.

25 MR. BROWN: Objection. Ambiguous.

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1 Vague. Leading.

2 Q. In your opinion, are you prominently
3 featured in that movie?

4 A. Yes.

5 MR. BROWN: Same objection.

6 Q. And, Mr. Flynt, there is a -- there
7 is a scene in the movie which depicts you for some
8 period of time as taking over the Hustler business
9 while, I believe, Larry was either incarcerated or
10 unavailable. Do you recall that scene?

11 A. Yes, that was during the
12 conservatorship time that a federal judge in
13 Los Angeles sent my brother to federal authorities
14 for psychological evaluation.

15 Q. Do you recall how long your brother
16 was -- your brother, Larry, was away for that
17 psychological evaluation?

18 MR. BROWN: Objection. Relevance.

19 A. Oh, about -- about five or six
20 months.

21 Q. And during that -- do you remember
22 the time frame? What year was that; do you
23 remember?

24 A. Oh, '83, '84, '85.

25 Q. Okay. So in the mid-'80s?

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1 A. Yes.

2 Q. We'll call it the mid-'80s. During
3 that time period, that five- or six-month time
4 period in the mid-'80s, is the movie depiction
5 accurate in terms of you being the person who is in
6 charge of running Hustler?

7 MR. BROWN: Objection.

8 A. Yes.

9 MR. BROWN: Relevance. Ambiguous.

10 Q. And how did that come to pass?
11 Specifically, did Larry ask you to do it? Do you
12 recall how it came to be that you became the person
13 in charge of Hustler while Larry was unavailable?

14 MR. BROWN: Objection. Relevance.

15 Ambiguous.

16 A. Well, they --

17 MR. BROWN: Vague.

18 A. They explained to me at the time --
19 the attorneys explained to me at the time that the
20 fiduciary duty went first to his wife, spouse, who
21 was incapacitated and unable to perform those
22 duties. And then I guess it went to the parent.
23 And both my mother and father was incapable of that
24 task. And then it went to a sibling, who is me, and
25 a judge in Los Angeles appointed me conservator.

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1 Q. And as part of your duty as the
2 conservator, you were in charge of operating the
3 Hustler business?

4 A. Yes.

5 Q. To your knowledge at that time, did
6 Larry approve of you being appointed as the
7 conservator to operate the Hustler business?

8 MR. BROWN: Objection. Relevance.
9 Ambiguous. Vague.

10 Q. And let me make sure my question is
11 clear, Mr. Flynt. I am asking you: At that time
12 did your brother, Larry, in any way communicate to
13 you that he was in agreement that you should be the
14 person that should be the conservator to take over
15 the operations of the Hustler business?

16 MR. BROWN: Objection. Vague.

17 Leading. Relevance.

18 A. Well, you know, he was -- he was --
19 best I remember, he was okay with it, but then he
20 was on again, off again, and that is why he was
21 where he was at for evaluation.

22 Q. You testified that going back to the
23 '70s, you and your brother -- well, strike that.

24 I would like for you to indulge us a
25 little and give us a short -- well, strike that.

14 (Pages 50 to 53)

| Page 54 | Page 56 |
|--|--|
| <p>1 When did you, sir, enter the adult 2 business? When did you first start working in the 3 adult entertainment business? 4 A. 1969 I entered -- I returned from 5 Vietnam in April of 1969 and my brother and I opened 6 a club in November of 1969, which is 40 years ago 7 next month. And that was my -- that was, quote -- I 8 was 20 years old and that was my first venture in, 9 quote, the -- the world of erotica. 10 Q. And then for the next five years, 11 from 1969 to, say, 1974, did you and your brother 12 operate any other clubs that were in -- that were 13 involved in the adult entertainment industry? 14 MR. BROWN: Objection. Relevance. 15 Ambiguous. Calls for a narrative. 16 A. We opened -- we opened several clubs 17 around the state of Ohio in the early 1970s. And 18 then I owned -- I owned those clubs at that time and 19 we were partners and that didn't -- that didn't make 20 a difference. 21 And, also, in 1974 when we launched 22 the magazine from Columbus, Ohio, I also owned the 23 magazine. And we have always been, quote, 24 protective of one another and we have always been 25 brothers and shared in the ups and downs of the</p> | <p>1 earned in various capacities from the adult 2 entertainment business? 3 A. Yes. 4 Q. And in your opinion, you have earned 5 a significant amount of notoriety by virtue of your 6 activities in the adult entertainment industry? 7 A. Yes. 8 Q. And your brother, Larry, has earned a 9 significant amount of notoriety in the adult 10 entertainment business, as well, I believe, as you 11 have indicated? 12 A. Yes. 13 MR. DeCARLO: If you could, please, I 14 would like to place in front of the 15 witness a series of photographs. There 16 are eight photographs -- 17 MR. SIRKIN: We need a time-out. 18 MR. HOJNOSKI: Dan, before you finish 19 that question, we are going to take a 20 couple-minute restroom break, if you don't 21 mind. 22 MR. DeCARLO: Not at all. 23 MR. HOJNOSKI: Thank you. 24 (Recess taken: 11:49 a.m. to 11:55 a.m.) 25 MR. DeCARLO: Okay. Can we mark as</p> |
| Page 55 | Page 57 |
| <p>1 business. 2 Q. When do you recall, Mr. Flynt, first 3 starting to get some press coverage of your 4 businesses, either the clubs or the publication? 5 You know, when did -- when, to your recollection, 6 did the press start paying attention to what you and 7 your brother were doing? 8 MR. BROWN: Objection. Relevance. 9 A. Well, you know, we were -- we were 10 always known as the Flynt brothers from a -- you 11 know, from the midwest. When we launched the 12 magazine, I was co-publisher. 13 Q. Was that indicated on the masthead, 14 by the way? 15 A. Yes. Yes. 16 Q. How long were you listed on the 17 masthead as the co-publisher for Hustler? 18 MR. BROWN: Objection. Relevance. 19 Calls for speculation. 20 A. Oh, several -- several issues. And 21 then I took another -- I took another position and 22 his wife at that time, then, was put on the 23 masthead. 24 Q. So from 1969 through the current time 25 period, roughly 40 years, your livelihood has been</p> | <p>1 an exhibit -- we will mark as 2 Exhibit 414 -- if we could mark as Trial 3 Exhibit 414 a series of eight photographs 4 and if that could be placed in front of 5 the witness. 6 MR. BROWN: Okay. Dan, just to be 7 clear, you are speaking to the photographs 8 that were sent to us yesterday? 9 MR. DeCARLO: Right. I'm sorry. 10 It's six photographs, not eight. 11 MR. BROWN: Okay. I am objecting for 12 the record. These documents were sent and 13 produced yesterday. I believe they should 14 have been disclosed earlier. Therefore, I 15 am objecting to the use of them and 16 reserve any right to bring any type of 17 motion related to these exhibits. 18 That being said, I am placing what is 19 now marked Exhibit 414 in front of the 20 witness, which is six pages and a series 21 of the photographs that were submitted 22 yesterday. 23 (Trial Exhibit 414 was 24 marked for 25 identification.)</p> |

15 (Pages 54 to 57)

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1 BY MR. DeCARLO:

2 Q. Mr. Flynt, you are familiar with
3 retail stores under the Hustler brand; is that
4 correct?

5 A. Yes.

6 Q. And through your career you have been
7 involved in various capacities in the operation of
8 Hustler-branded retail stores?

9 A. I actually started and opened the
10 first one in the late '90s -- '97, '98 -- in
11 Cincinnati, and the retail idea and chain grew out
12 of that first location in Cincinnati.

13 Q. These are -- and today do you know
14 how many Hustler retail stores there are across the
15 country?

16 MR. BROWN: Objection. Relevance.
17 Ambiguous. Seeks information not relevant
18 to this action.

19 A. I believe there's eight. I believe
20 there's eight or nine, including Cincinnati.

21 Q. Have you been to all eight or nine of
22 the Hustler retail stores? Have you personally been
23 to all of them?

24 A. I opened all of them.

25 Q. When you say you opened all of them,

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1 what does that mean?

2 A. I found the location, I built them, I
3 opened the doors and turned on the lights.

4 Q. The photographs I have placed in
5 front of you, Mr. Flynt, there is a series of six
6 photographs which we have marked as Exhibit 414,
7 have you ever seen these photographs before?

8 A. Yes.

9 Q. Are all of -- are all of these
10 photographs photographs of the same location?

11 A. No.

12 Q. Are these photographs -- let's start
13 with page 1 of 414. Actually, let's start with
14 page -- page 4 of 414.

15 A. Okay.

16 Q. Do you know which Hustler retail
17 store that is, which location?

18 A. That's St. Louis.

19 Q. Okay. Now, there is a big sign,
20 "Relax...It's Just Sex," and then it says "Jimmy
21 Flynt" after it.

22 A. Yes.

23 Q. Is that a slogan that you came up
24 with?

25 A. Yeah, I coined that phrase in about

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1 '97 when we -- when we, Larry and I, designed the
2 idea of rolling out these retail stores.

3 Q. Mr. Flynt, are you on the Hollywood
4 Walk of Fame?

5 A. Yes. On Sunset Boulevard, yes.

6 Q. Your handprints are on Sunset
7 Boulevard on the Hollywood Walk of Fame?

8 A. Yes.

9 Q. Is the "Relax...It's Just Sex" slogan
10 on that -- on that?

11 A. Yes, along with my signature.

12 Q. Is the "Relax...It's Just Sex" slogan
13 depicted in all of the Hustler retail stores?

14 A. Yes.

15 Q. Is it -- would you -- would you say
16 that the sign that is depicted on page 414-4, would
17 you say that that is a prominent use of the slogan?

18 MR. BROWN: Objection. Ambiguous.
19 Relevance. Leading.

20 A. Yes.

21 Q. And in the other Hustler locations,
22 do they all have the sign, "Relax...It's Just Sex"?

23 A. Yes.

24 MR. BROWN: Objection. Relevance.
25 Leading.

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1 Q. In a manner that is as prominent as
2 depicted in Exhibit 414-4?

3 MR. BROWN: Objection. Ambiguous.
4 Relevance.

5 A. We -- we redesigned a couple of the
6 stores and re-merchandised them a little bit so that
7 we could increase the product space and might
8 have -- you know, might have shrank them a little
9 bit. But all of them -- all of the stores have the
10 quote, "Relax...It's Just Sex."

11 Q. Are there any slogans throughout any
12 of the Hustler stores, to your knowledge, quoting
13 anything from Larry Flynt?

14 MR. BROWN: Objection. Relevance,
15 ambiguous, and calls for speculation.

16 A. No.

17 Q. Did you discuss with Mr. Larry Flynt
18 the business reason for using this slogan in the
19 manner that it is being used in these Hustler retail
20 stores?

21 MR. BROWN: Objection. Relevance.

22 A. Well, everybody agreed that it was
23 kind of a cool quote, eye catching. We use it on
24 apparel, shirts, different product. It's a catchy
25 phrase. In fact, a lot of well-known companies use

16 (Pages 58 to 61)

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1 it now.
 2 Q. And it's been used in -- strike that.
 3 It's been used since 1997, is that
 4 your testimony?
 5 A. Yes.
 6 Q. In your opinion, Mr. Flynt, is it a
 7 well-known slogan in the adult entertainment
 8 industry?
 9 MR. BROWN: Objection. Relevance.
 10 A. Yes.
 11 Q. And it is readily apparent to
 12 consumers who shop at the Hustler retail stores;
 13 true?
 14 MR. BROWN: Objection. Relevance.
 15 Calls for speculation.
 16 A. Yes.
 17 Q. Mr. Flynt, in your opinion, does the
 18 "Relax...It's Just Sex" slogan -- has that
 19 contributed to your fame or notoriety in the adult
 20 entertainment industry?
 21 MR. BROWN: Objection. Relevance.
 22 Also calls for speculation.
 23 A. It's -- I was always credited with
 24 the quote from various people as the -- it's a cool
 25 quote and I was always associated with that quote.

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1 Q. Do you personally, Mr. Flynt, have
 2 any objection to your sons using their last name,
 3 Flynt, in association with any businesses that they
 4 operate?
 5 MR. BROWN: Objection. Relevance.
 6 A. No.
 7 MR. DeCARLO: Okay. I would like to
 8 place in front of the witness as
 9 Exhibit 415 an article from June 2002 in
 10 the Cincinnati Magazine.
 11 MR. BROWN: Okay. And I am also
 12 objecting to this as not being previously
 13 disclosed. It was provided to us for the
 14 first time yesterday. So the same set of
 15 objections.
 16 415 did you say, Dan?
 17 MR. DeCARLO: Yeah.
 18 MR. BROWN: Okay. I am placing in
 19 front of the witness an excerpt -- or what
 20 appears to be an excerpt from Cincinnati
 21 Magazine dated June 2002.
 22 (Trial Exhibit 415 was
 23 marked for
 24 identification.)
 25 BY MR. DeCARLO:
 Q. Do you remember this article.

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1 Mr. Flynt?
 2 A. Yes.
 3 Q. Do you know -- do you know what
 4 Cincinnati Magazine is?
 5 A. Yes.
 6 Q. All right. And is it true that you
 7 were interviewed extensively for this story?
 8 A. Yes.
 9 Q. In your opinion, do you have a
 10 significant amount of fame in Cincinnati?
 11 MR. BROWN: Objection. Relevance.
 12 Also speculative.
 13 A. I am -- I am quite -- quite known
 14 around town.
 15 Q. And do you have -- can you tell me
 16 why you are quite known around town in Cincinnati?
 17 MR. BROWN: Objection. Calls for
 18 speculation. Relevance.
 19 A. Well, for the last -- for the last 40
 20 years myself and my brother have been in the media
 21 quite often. And, you know, the name Flynt is
 22 always somewhat controversial around the Ohio
 23 market. And my brother and I kind of look alike and
 24 we are quite recognizable.
 25 Q. Let me ask you a couple of questions

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1 about the name -- the spelling of the name. You and
 2 your brother, Larry, you said, have both the same
 3 mother and father?
 4 A. Yes.
 5 Q. Do you know how your father spelled
 6 his last name?
 7 A. My father, prior to the military in
 8 the early 1940s, spelled it with a Y. But when he
 9 was drafted in World War II, just like a lot of
 10 immigrants coming into the U.S. through Ellis
 11 Island, they got their names spelled wrong or
 12 shortened. My father's name somehow got spelled
 13 with an I in the military. I don't think he had a
 14 real problem with that because there were close
 15 relatives of his in Kentucky who spelled it with an
 16 I also. But my father's father, my grandfather,
 17 spelled it with a Y. When he got out of the
 18 military in the late '40s, he kind of continued to
 19 spell it with an I. And then later on in life I
 20 noticed he had spelled it with a Y.
 21 Q. So do you know why on your birth
 22 certificate it indicated F-l-i-n-t as opposed to
 23 F-l-y-n-t?
 24 A. Well, both Larry and I were born at
 25 home, you know, midwives and in the hills of Eastern

17 (Pages 62 to 65)

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1 Kentucky. It was quite easy to get that name
2 spelled wrong under those circumstances. And it
3 wasn't any big deal because it was one big Flynt
4 family back there and some spelled it with an I and
5 some spelled it with a Y, but we were all blood
6 connected.

7 Q. So in the mid-'70s when you formally
8 changed the spelling of your name from I to Y, what
9 was your thought process, if you can recall, as to
10 why you decided it was time to formally change the
11 way it was spelled?

12 A. Well, like I said before, my brother
13 and I were becoming well-known around the Ohio
14 market. And to be quite frank with you, the name
15 F-l-y-n-t had a -- had a cooler font to it, so to
16 speak, than F-l-i-n-t. And then, you know, you have
17 an older brother and, you know -- you know, you just
18 end up wanting to -- wanting to -- wanting to sign
19 your name the same. So on my -- on my birth
20 certificate and discharge from the Army, I had
21 F-l-i-n-t, and I went into Common Pleas Court in
22 Columbus, Ohio, in 1975 and had it officially
23 changed from I to Y.

24 Q. By the way, back to the issue -- back
25 to the question about The People vs. Larry Flynt and

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1 that we were involved in together.

2 Q. Do you recall if either one of those
3 trials garnered press coverage?

4 A. Well, it was in 1997 -- I mean, 1977
5 they had us charged with organized crime and Paul
6 Cambria got me acquitted and my brother was found
7 guilty, which immediately gave him a podium and he
8 took advantage of it. And then there was no --
9 there was no resolution to the '98 case, '99 case,
10 other than the corporation that I owned at that time
11 pleaded guilty.

12 Q. Do you recall if either one of those
13 trials generated a significant amount of press
14 coverage?

15 MR. BROWN: Objection. Calls for
16 speculation.

17 Q. If you can remember.

18 A. Well, they both -- they both created
19 a tremendous amount of publicity at that time, both
20 in the '70s and in the '90s, because I had opened
21 this store in Cincinnati and the media was calling
22 from all around the world wanting to know why I was
23 arrested for operating a retail outlet. So we --

24 Q. Do you have -- I'm sorry. Go ahead.

25 A. We -- Larry and I both got a

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1 when you spoke of that period of time as Larry's
2 conservator, I believe there is also a scene in the
3 movie when Larry comes back where he whispers in
4 your ear, I think it was, "I love you."

5 A. Yeah.

6 Q. Is the movie accurate in the sense
7 that Larry was very grateful about what you did
8 while he was unavailable?

9 MR. BROWN: Objection. Relevance.

10 A. I think -- I think so. I think so.

11 You know, it's hard to share one's feeling when they
12 are in a predicament like that when a blood relative
13 does something as grand as that and not only
14 preserving your assets but keeping your name and
15 reputation intact.

16 Q. And you indicated that you have also
17 stood trial with your brother, Larry, on more than
18 one occasion for criminal charges?

19 MR. BROWN: Objection. Relevance.

20 A. Yeah, we were -- we were on trial in
21 a criminal action in 1977. By the way, Paul Cambria
22 with Mr. Brown's firm represented me. And I was
23 also on trial with my brother in 1997, '98 in
24 Cincinnati. Mr. Cambria was also my attorney. So,
25 yes, that's the two major nationally known cases

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1 tremendous amount of publicity over opening a
2 hole-in-the-wall store in Cincinnati.

3 Q. Do you have an opinion, Mr. Flynt,
4 about whether the press coverage from the '77 trial
5 or the late '90s trial contributed to your notoriety
6 or fame?

7 MR. BROWN: Objection. Calls for
8 speculation. And relevance.

9 A. Well, I think it contributed to the
10 notoriety as, quote, the Flynt brothers, and I think
11 they were synonymous together with Hustler. And we
12 kind of shared -- Larry and I kind of shared
13 different responsibilities. You know, he was -- he
14 was the spokesperson and the out-front character and
15 outrageous individual out there and I was more of
16 the social animal in the background who kept things
17 glued together.

18 Q. I have come to learn, Mr. Flynt,
19 throughout this case that there is a fairly
20 substantial industry press operation now: AVN,
21 XBIZ. Are you familiar with AVN and XBIZ?

22 A. Yes.

23 Q. And they report on the adult
24 industry, correct?

25 A. Yes.

18 (Pages 66 to 69)

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1 Q. Back in the '70s when you were on
2 trial, was there the equivalent of an industry press
3 core like XBIZ or AVN today? Was there any
4 equivalent back in the late '70s to that?
5 A. No.
6 MR. BROWN: Objection. Calls for
7 speculation.
8 A. No.
9 Q. So the press coverage that you
10 received in the late '70s for the trial would have
11 been the general press, not the adult press?
12 MR. BROWN: Objection. Relevance and
13 calls for speculation.
14 A. Yes. Yes.
15 Q. How about the late '90s? To your
16 recollection, was AVN a press -- a force of --
17 strike that.
18 Was AVN active in the late '90s, to
19 your knowledge, in the adult entertainment industry?
20 A. Yes.
21 MR. BROWN: Objection. Calls for
22 speculation. Relevance.
23 Q. And how do you know that?
24 A. Well, I mean, I think -- I think AVN
25 came out in the early '80s. XBIZ wasn't around at

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1 that time.
2 MR. DeCARLO: Okay. Thank you,
3 Mr. Flynt. I don't have any further
4 questions for you.
5 THE WITNESS: Okay.
6 MR. BROWN: Okay. I just have -- I
7 just have a few more.
8 REDIRECT EXAMINATION
9 BY MR. BROWN:
10 Q. Mr. Flynt, Exhibit 414 is in front of
11 you. It's the series of photographs that
12 Mr. DeCarlo identified. You said you recognized
13 those photographs. Is that your testimony?
14 A. Yes.
15 Q. Okay. When was the last time you saw
16 those photographs?
17 A. Probably three or four years ago.
18 Q. Okay. And the same thing with the
19 Cincinnati Magazine, Exhibit 415. When was the last
20 time you saw that magazine -- or that excerpt of the
21 June 2002 issue?
22 A. It has been a long time. Three or
23 four years, probably.
24 Q. Did your sons at any point in time
25 convey to you the idea that they were using the

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1 Flynt name in the adult entertainment industry
2 because they were angry with Larry?
3 A. No.
4 Q. Did they ever express to you any
5 anger they had with being terminated from the LFP
6 family of companies?
7 A. I would say more confused because of
8 their time of employment. Like I said, 15 and 10
9 years without any disruption, reprimand, write-up,
10 coaching. Kind of got blindsided by the termination
11 and didn't quite understand it. I don't think there
12 was hostility or anybody mad. Just confusion.
13 Q. Are you aware of any statement made
14 by your son, Jimmy, that, "We are forming this
15 company, Flynt Media Corporation, because of what
16 Larry did to us"?
17 A. No.
18 Q. Okay. And I want to reference this
19 exhibit that Mr. DeCarlo had provided to us,
20 Exhibit 415. And I am on -- oh, what is it? --
21 page 88. It looks like it's -- one, two, three --
22 four pages in.
23 Okay. And there is -- on the second
24 column -- and I will just start here. If you go to
25 the second full paragraph, it says, "There was a

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1 telling moment in the brothers' 1999 obscenity trial
2 in Hamilton County. It was during jury selection
3 (ultimately, the whole affair was plea bargained;
4 there was no trial) when a potential juror mentioned
5 that he'd seen the movie The People vs. Larry Flynt
6 starring Woody Harrelson.
7 "A prosecutor asked what the man
8 remembered about Larry Flynt from the movie.
9 "I liked Woody Harrelson."
10 "And Jimmy Flynt?"
11 "The juror looked at Jimmy. 'I don't
12 remember Jimmy,' he said apologetically."
13 Do you see that?
14 A. Yes.
15 Q. Okay. In your mind, you know --
16 well, let me back up. In your mind, have you ever
17 been the butt of a joke, so to speak, that your
18 brother is the most famous person in the family and
19 you are the -- you are the second -- second one down
20 on the fame scale?
21 MR. DeCARLO: Objection. That is
22 vague and ambiguous.
23 A. I think what they are talking about
24 there more is Woody than Larry. And like I said in
25 the past, you know, that we have shared the

19 (Pages 70 to 73)

| Page 74 | Page 76 |
|--|---|
| <p>1 limelight equally and him being infamous and me 2 being famous. I don't know what kind of level or 3 what kind of meter or gauge you put on that. But, 4 yeah, I think they were more infatuated with Woody 5 Harrelson, myself.</p> <p>6 MR. BROWN: Okay. I don't have 7 anything further.</p> <p>8 RECROSS-EXAMINATION</p> <p>9 BY MR. DeCARLO:</p> <p>10 Q. I have one follow-up question, 11 Mr. Flynt. I don't think I asked this before about 12 the movie.</p> <p>13 MR. BROWN: Same objections, by the 14 way.</p> <p>15 Q. Okay. Is the movie accurate in that 16 when Larry came back he told you he loved you?</p> <p>17 A. Yes.</p> <p>18 MR. BROWN: Asked and answered.</p> <p>19 A. Yes.</p> <p>20 MR. DeCARLO: Okay. I don't have 21 anything else.</p> <p>22 MR. BROWN: Okay. Thank you, 23 Mr. Flynt.</p> <p>24 Let's go off the record for a 25 minute.</p> | <p>1 MR. BROWN: Thank you.</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> |
| Page 75 | Page 77 |
| <p>1 (Recess taken: 12:23 p.m. to 12:25 p.m.)</p> <p>2 MR. BROWN: The attorneys for 3 Mr. Flynt and the attorneys for the 4 defendants and the plaintiffs' counsel 5 have all met and conferred off the record 6 regarding the transcript. The original 7 will go to the Reminger firm's law office 8 and he will then transmit it to Mr. Flynt 9 for his review. Mr. Flynt will have 20 10 days upon receipt in which to review and 11 make any corrections and sign the 12 transcript. If he does not provide us 13 with the original signature, the 14 deposition transcript will be deemed 15 executed after the 20 days. Moreover, if 16 the original -- the original will be, 17 then, transmitted to my office in Buffalo, 18 New York. This is Mr. Brown. I will 19 maintain the original for purposes of the 20 trial. If the original is lost or 21 misplaced, a certified copy can stand in 22 its place. Is that agreeable?</p> <p>23 MR. DeCARLO: That is agreeable to 24 me.</p> <p>25 MR. HOJNOSKI: Fine with me.</p> | <p>1 CERTIFICATE</p> <p>2 STATE OF OHIO :</p> <p>3 :SS</p> <p>4 COUNTY OF HAMILTON :</p> <p>5 I, Lisa L. Weisenberger, a duly qualified 6 and commissioned notary public in and for the State 7 of Ohio, do hereby certify that prior to the giving 8 of his deposition, the within named JIMMY FLYNT was 9 by me first duly sworn to testify the truth, the 10 whole truth and nothing but the truth; that the 11 foregoing pages constitute a true and correct 12 transcript of testimony given at said time and place 13 by said deponent; that said deposition was taken by 14 me in stenotypy and transcribed under my 15 supervision; that I am neither a relative of nor 16 attorney for any of the parties to this litigation, 17 nor relative of nor employee of any of their 18 counsel, and have no interest whatsoever in the 19 result of this litigation. I further certify that I 20 am not, nor is the court reporting firm with which I 21 am affiliated, under a contract as defined in Civil 22 Rule 28(D).</p> <p>23 IN WITNESS WHEREOF, I hereunto set my hand and 24 official seal of office, at Cincinnati, Ohio, this 25 27th day of October, 2009.</p> <p>26</p> <p>27</p> <p>28</p> <p>29</p> <p>30</p> <p>31</p> <p>32</p> <p>33</p> <p>34</p> <p>35</p> <p>36</p> <p>37</p> <p>38</p> <p>39</p> <p>40</p> <p>41</p> <p>42</p> <p>43</p> <p>44</p> <p>45</p> <p>46</p> <p>47</p> <p>48</p> <p>49</p> <p>50</p> <p>51</p> <p>52</p> <p>53</p> <p>54</p> <p>55</p> <p>56</p> <p>57</p> <p>58</p> <p>59</p> <p>60</p> <p>61</p> <p>62</p> <p>63</p> <p>64</p> <p>65</p> <p>66</p> <p>67</p> <p>68</p> <p>69</p> <p>70</p> <p>71</p> <p>72</p> <p>73</p> <p>74</p> <p>75</p> <p>76</p> <p>77</p> <p>78</p> <p>79</p> <p>80</p> <p>81</p> <p>82</p> <p>83</p> <p>84</p> <p>85</p> <p>86</p> <p>87</p> <p>88</p> <p>89</p> <p>90</p> <p>91</p> <p>92</p> <p>93</p> <p>94</p> <p>95</p> <p>96</p> <p>97</p> <p>98</p> <p>99</p> <p>100</p> <p>101</p> <p>102</p> <p>103</p> <p>104</p> <p>105</p> <p>106</p> <p>107</p> <p>108</p> <p>109</p> <p>110</p> <p>111</p> <p>112</p> <p>113</p> <p>114</p> <p>115</p> <p>116</p> <p>117</p> <p>118</p> <p>119</p> <p>120</p> <p>121</p> <p>122</p> <p>123</p> <p>124</p> <p>125</p> <p>126</p> <p>127</p> <p>128</p> <p>129</p> <p>130</p> <p>131</p> <p>132</p> <p>133</p> <p>134</p> <p>135</p> <p>136</p> <p>137</p> <p>138</p> <p>139</p> <p>140</p> <p>141</p> <p>142</p> <p>143</p> <p>144</p> <p>145</p> <p>146</p> <p>147</p> <p>148</p> <p>149</p> <p>150</p> <p>151</p> <p>152</p> <p>153</p> <p>154</p> <p>155</p> <p>156</p> <p>157</p> <p>158</p> <p>159</p> <p>160</p> <p>161</p> <p>162</p> <p>163</p> <p>164</p> <p>165</p> <p>166</p> <p>167</p> <p>168</p> <p>169</p> <p>170</p> <p>171</p> <p>172</p> <p>173</p> <p>174</p> <p>175</p> <p>176</p> <p>177</p> <p>178</p> <p>179</p> <p>180</p> <p>181</p> <p>182</p> <p>183</p> <p>184</p> <p>185</p> <p>186</p> 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by Flynn









